

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
)	Chapter 11
)	
JOANN INC., <i>et al.</i> ¹)	Case No. 25-10068 (CTG)
)	
)	(Jointly Administered)
Debtors.)	
)	

**Objection Deadline: March 14, 2025 at 4:00 p.m. (ET)
Hearing Date: April 3, 2025 at 1:00 p.m. (ET)**

**NOTICE OF MOTION FOR AN ORDER AUTHORIZING THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS TO FILE UNDER SEAL THE NAMES
OF CERTAIN CONFIDENTIAL PARTIES IN INTEREST RELATED TO THE
COMMITTEE'S PROFESSIONAL RETENTION APPLICATIONS**

PLEASE TAKE NOTICE that, on February 28, 2024 The Official Committee of Unsecured Creditors (the “Committee”) appointed in the chapter 11 cases of the above-captioned Debtors filed the *Motion For An Order Authorizing The Official Committee Of Unsecured Creditors To File Under Seal The Names Of Certain Confidential Parties In Interest Related To The Committee's Professional Retention Applications* (the “Motion”) with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801 (the “Bankruptcy Court”). A copy of the Motion is attached hereto.

PLEASE TAKE FURTHER NOTICE that any response or objection to the Motion must be (a) filed with the Bankruptcy Court on or before **March 14, 2025 at 4:00 p.m. prevailing Eastern Time.**

¹ The Debtors in these chapter 11 cases are: JOANN Inc.; Needle Holdings LLC; Jo-Ann Stores, LLC; Creative Tech Solutions LLC; Creativebug, LLC; WeaveUp, Inc.; JAS Aviation, LLC; joann.com, LLC; JOANN Ditto Holdings Inc.; Dittopatterns LLC; JOANN Holdings 1, LLC; JOANN Holdings 2, LLC; and Jo-Ann Stores Support Center, Inc.

PLEASE TAKE FURTHER NOTICE that at the same time, you must also serve a copy of the response or objection upon the undersigned counsel.

PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

PLEASE TAKE FURTHER NOTICE THAT A HEARING HAS BEEN SCHEDULED TO CONSIDER THE RELIEF SOUGHT IN THE APPLICATION ON **APRIL 3, 2025 AT 1:00 P.M. (prevailing Eastern Time) BEFORE THE HONORABLE CRAIG T. GOLDBLATT, UNITED STATES BANKRUPTCY COURT JUDGE, AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 MARKET STREET, 3RD FLOOR, COURTROOM NO. 7, WILMINGTON, DELAWARE 19801.**

[Remainder of Page Intentionally Left Blank]

Dated: February 28, 2025

PACHULSKI STANG ZIEHL & JONES LLP

By: /s/ James E. O'Neill

Bradford J. Sandler (DE Bar No. 4142)
James E. O'Neill (DE Bar No. 4042)
919 North Market Street, 17th Floor
P.O. Box 8705
Wilmington, DE 19801
Telephone: (302) 652-4100
Facsimile: (302) 652-4400
Email: bsandler@pszjlaw.com
joneill@pszjlaw.com

- and -

KELLEY DRYE & WARREN LLP

Jason R. Adams (admitted *pro hac vice*)
Eric R. Wilson (admitted *pro hac vice*)
William S. Gyves (admitted *pro hac vice*)
Maeghan J. McLoughlin (admitted *pro hac vice*)
3 World Trade Center
175 Greenwich Street
New York, NY 10007
Tel.: (212) 808-7800
Email: jadams@kelleydrye.com
ewilson@kelleydrye.com
wgyves@kelleydrye.com
mmcloughlin@kelleydrye.com

*Proposed Co-Counsel to the Official Committee
of Unsecured Creditors*